



EPA Region 5 Records Ctr.



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Solutia Inc.

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January 12, 2004

Mr. Nabil S. Fayoumi
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590

**Re: Sauget Sites Area I - January 21, 1999 Administrative Order by Consent (AOC)
Monthly Report December 1 – December 31, 2003**

Dear Mr. Fayoumi,

Enclosed is the Sauget Sites Area I Monthly Report for the December 2003 reporting period. This submittal is in fulfillment of the monthly requirements of Section 2.4 Reporting, of the January 21, 1999 Final Administrative Order by Consent for Sauget Sites Area I, Sauget and Cahokia, Illinois.

Sincerely,

Gary Vandiver
Project Coordinator
Solutia Inc.

cc: Kevin Turner – USEPA
Tim Gouger - USACE
Sandra Bron - IEPA
Dave Webb - IDPH
Mike Coffey - USF&W
Richard Williams - Solutia
Cathleen Bumb - Solutia
Linda Tape – Husch & Eppenberger
Mayor Frank Bergman - Cahokia, IL
Village of Sauget - c/o P. H. Weis & Associates (Attn: Brian Nelson)
Mayor R. Sauget - Sauget, IL
Jeff Klieve - Monsanto

Sauget Sites Area I - Sauget, Illinois

AOC - EECA / RIFS

Monthly Report

Date of Report: January 9, 2004
Period Covered: December 1, 2003 - December 31, 2003

Solutia and 14 of its U.S. subsidiaries filed voluntary petitions for reorganization under Chapter 11 of the U.S. Bankruptcy Code on December 17, 2003.

Work Performed during the reporting period

Borrow Pit Lake

Sediment sampling in the Borrow Pit Lake commenced on May 6, 2003 and was completed on May 14, 2003. All sampling activities were observed on a full time basis by a USEPA oversight contractor. No deficiencies or problems were identified by the oversight personnel during the sampling. Samples were shipped to the analytical laboratories identified in the QAPP for analysis. Laboratory results were validated. The draft report was submitted to the Agency on September 2, 2003.

The BPL ecological assessment was conducted on October 20-22. EPA oversight was in attendance.

Dead Creek

Received U.S. EPA's comments for:

- *Dead Creek, Review of Responses to Comments and Proposed Action Plan*
- *Human Health Risk Assessment, Sauget Area One Site, Illinois.*

Solutia provided a general response on December 4, 2003 and requested a meeting with the Agencies. There are several substantive issues that need to be discussed and resolved before we can move forward with preparation of plans that will ultimately result in the completion of the remedy for Dead Creek.

DNAPL Work Plan

Comments were received on the DNAPL Investigation Work Plan that was submitted to the Agency on February 28, 2003. Responses to these comments were submitted to the Agencies on May 13, 2003. The Agency responded on July 24, 2003 requiring Solutia to submit responses and an approvable DNAPL Work Plan that will address all focus areas and information requested in the January 9, 2003, U.S. EPA Additional Work Letter. The response to comments and the Work Plan were submitted to the Agency on August 14, 2003. Comments were received from the Agencies on October 15 and a response was sent on November 3.

Conditional approval of the DNAPL Workplan was received on December 23, 2003 which requires completion of the investigation and submittal of the DNAPL Report by June 23, 2004.

Attachments

There are no Technical Memoranda or data submittals with this report.

Work scheduled for next reporting period

- *prepare report of the Habitat Assessment.*

Submittal Schedule Status

No submittals are currently scheduled.